
**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**MICHAEL LEE, as the
Administrator of the Estate of
RAVEN E. LEE, AND**

**ANDERSON BASTONE, as the
Administrator of the Estate of
CHAZ BASTONE**

PLAINTIFFS,

v.

**GOLF TRANSPORTATION, INC,
OCONNOR TRUCKING, INC.,
JP LOGISTICS, INC., UNITED
NATURAL FOODS INC.,
UNFI TRANSPORT LLC,
and
COYOTE LOGISTICS, LLC**

DEFENDANTS.

CIVIL ACTION – LAW

JURY TRIAL DEMANDED

NO.: 21-CV-1948

MOTION FOR LEAVE TO WITHDRAW AS COUNSEL

AND NOW COMES, Petitioner, Edward J. Ciarimboli, Esquire, on behalf of
Fellerman & Ciarimboli Law, P.C. to file the instant Motion for Leave to Withdraw
as Counsel for Plaintiffs, and avers as follows:

1. Petitioner, Edward J. Ciarimboli, Esquire is a Partner at Fellerman & Ciarimboli Law, P.C., located at 183 Market Street, Suite 200, Kingston, Luzerne County, PA 18704.

2. Plaintiff, Michael Lee, is a competent adult individual who resides at 9100 Grayling Drive, Las Vegas, Clark County, Nevada 89134.

3. Plaintiff, Anderson Bastone, is a competent adult individual who resides at 220 West Branch Avenue, Apartment 217, Pine Hill, NJ 08021.

4. The above referenced action is currently pending in the United States District Court for the Middle District of Pennsylvania at Docket No. 21-CV-1948.

5. The action arises out of a commercial motor vehicle accident that occurred on October 7, 2020 in Lackawanna County, Pennsylvania.

6. Plaintiffs and Fellerman & Ciarimboli Law, P.C., entered into Contingent Fee Agreements through which Plaintiffs agreed that they would be represented by Fellerman & Ciarimboli Law, P.C. who would pursue claims for the fatal injuries and damages that Plaintiffs' Decedents sustained as a result of the October 7, 2020 crash.

7. Attorneys Edward J. Ciarimboli and Corey S. Suda, an Associate at Fellerman & Ciarimboli Law, P.C., entered their appearances in this matter on behalf of Plaintiffs Lee and Bastone.

8. On February 23, 2023, Attorney Mark S. Rosenberg and Plaintiff, Michael Lee sent an email to Fellerman & Ciarimboli, PC, advising that the Firm was discharged and stating that Mr. Lee had chosen Michael J. O'Neill, Esquire to represent him as Administrator of his daughter's estate in this matter.

9. Pursuant to Pennsylvania Rule of Professional Conduct 1.16(a)(3), a lawyer "shall withdraw from the representation of a client if the lawyer is discharged."

10. On February 24, 2023, the Piazza Law Group filed its Notice of Appearance on behalf of Plaintiff, Anderson Bastone.

11. On February, 24, 2023, the Piazza Law Group and Anderson Bastone sent Fellerman & Ciarimboli an email that stated: "[i]n accordance with your request to withdraw, this is to confirm that the Fellerman & Ciarimboli firm is relieved of further involvement in the above matter. You may withdraw your appearance."

12. Pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1), a lawyer "may withdraw from the representation of a client if withdrawal can be accomplished without material adverse effect on the interests of the client." As Plaintiff Bastone has chosen new counsel, withdrawal is permitted under this subsection of the Rules.

WHEREFORE, the undersigned counsel requests that this Honorable Court grant the Firm's Motion for Leave to Withdraw the appearances of Edward J.

Ciarimboli and Corey S. Suda as Counsel for Plaintiffs Lee and Bastone in this matter.

Respectfully submitted,

FELLERMAN & CIARIMBOLI LAW, P.C.



By: _____
Edward J. Ciarimboli, Esquire

Date: March 3, 2023

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CERTIFICATE OF SERVICE

I, Edward J. Ciarimboli, Esquire hereby certify that on the 3rd day of March 2023, a true and correct copy of Petitioner's Motion for Leave to Withdraw as Counsel was served electronically via CM/ECF system to the following participants in this case:

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FELLERMAN & CIARIMBOLI LAW, P.C.



By: _____
Edward J. Ciarimboli, Esquire